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## *Co-Liaison Counsel for the Volkswagen Group Defendants*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

15 IN RE: VOLKSWAGEN “CLEAN DIESEL” ) MDL No. 2672 CRB (JSC)  
16 MARKETING, SALES PRACTICES, AND )  
17 PRODUCTS LIABILITY LITIGATION )  
18 \_\_\_\_\_ )  
19 This Document Relates to: )  
20 ALL ACTIONS (except securities actions) )  
21 )  
22 )  
23 )

1               WHEREAS, on February 25, 2016, the Court entered Pre-Trial Order No. 9  
2 (Docket No. 1252), which, in Paragraph 4(B), requires the exchange of Rule 26 initial  
3 disclosures on or before April 6, 2016;

4               WHEREAS, the Volkswagen Group and Porsche Defendants and the Plaintiffs'  
5 Steering Committee have agreed that the deadline for serving Rule 26 initial disclosures as  
6 between them will be April 15, 2016;

7               WHEREAS, the Volkswagen Group Defendants and Plaintiff the Federal Trade  
8 Commission (the "FTC") have agreed that the deadline for serving Rule 26 initial disclosures as  
9 between them will be April 8, 2016;

10              WHEREAS, Pre-Trial Order No. 9, in Paragraph 4(E)(ii), requires Defendants'  
11 written responses and objections to requests for the production of documents to be served within  
12 45 days after service of such requests;

13              WHEREAS, the Volkswagen Group and Porsche Defendants and the Plaintiffs'  
14 Steering Committee have agreed to extend the deadline for the Volkswagen Group and Porsche  
15 Defendants to serve written responses and objections to the Plaintiffs' Steering Committee's  
16 pending document requests by nine days; and

17              WHEREAS, no previous request for an extension of these deadlines has been  
18 sought.

19              NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and  
20 among the parties, that:

21              1.         The Volkswagen Group and Porsche Defendants shall serve Rule 26 initial  
22 disclosures on the Plaintiffs' Steering Committee, and the Plaintiffs' Steering Committee shall  
23 serve their Rule 26 initial disclosures, by April 15, 2016.

24              2.         The Volkswagen Group Defendants shall serve Rule 26 initial disclosures  
25 on the FTC, and the FTC shall serve their Rule 26 initial disclosures, by April 8, 2016.

26              3.         The Volkswagen Group and Porsche Defendants shall have an additional  
27 nine days to serve their written responses and objections to the Plaintiffs' Steering Committee's  
28 pending document requests.

1  
2 Dated: April 7, 2016

Respectfully submitted,

3 By: /s/ Elizabeth J. Cabraser (with permission)  
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9  
10 *Plaintiffs' Lead Counsel*

Dated: April 7, 2016

Respectfully submitted,

11 By: /s/ Robert J. Giuffra, Jr.  
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21 *Co-Liaison Counsel for the Volkswagen  
22 Group Defendants*

Dated: April 7, 2016

Respectfully submitted,

By: /s/ Cari K. Dawson (with permission)

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*Liaison Counsel for Porsche Cars North America, Inc.*

Respectfully submitted,

By: /s/ Jonathan Cohen (with permission)

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*Attorneys for Plaintiff Federal Trade Commission*

\* \* \*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 7, 2016.



CHARLES R. BREYER  
United States District Judge

1                   **ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

2                   In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the  
3 filing of this document has been obtained from the signatories.

4                   Dated: April 6, 2016

SULLIVAN & CROMWELL LLP

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6                   /s/ Laura Kabler Osswell

Laura Kabler Osswell

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